

FILED 10 MAR 17 15:07 USDC-ORP

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

No. CR 10 - 93-Ki

**v.**

**INDICTMENT**

**MICHELE LYNN PEDERSEN,**

**29 U.S.C. § 501(c)  
29 U.S.C. § 439(b)**

**Defendant.**

**THE GRAND JURY CHARGES:**

**COUNTS 1 - 5**

**(Embezzlement and Theft of Labor Union Assets - 29 U.S.C. § 501(c))**

1. On or about the dates listed below, in the District of Oregon, defendant **MICHELE LYNN PEDERSEN**, while the treasurer of the American Federation of State, County, and Municipal Employees Local Union 2746, a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j), did embezzle, steal, and unlawfully and willfully abstract and convert to her own use, the moneys, funds, securities, property, and other assets of said labor organization, in the approximate amounts listed below:

<u>Count</u>	<u>Date</u>	<u>Check No.</u>	<u>Amount of Embezzled Funds</u>
1	7/5/2005	2100	\$490.00
2	5/29/2006	2203	\$3,300.00
3	6/9/2006	2212	\$407.00
4	6/9/2006	2213	\$678.23
5	7/6/2006	2226	\$489.00

All in violation of 29 U.S.C. § 501(c).

### **COUNTS 6 - 8**

#### **(Falsification of Annual Financial Report Filed by Labor Union - 29 U.S.C. § 439(b))**

2. At all times material to this Indictment, the American Federation of State, County, and Municipal Employees Local Union 2746 ("LU 2746"), was a labor organization in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j).

3. On or about the dates listed below, in the District of Oregon, defendant **MICHELE LYNN PEDERSEN**, did knowingly make a false statement and representation of material fact, by falsely stating that she received \$0 in disbursements from LU 2746, in a report required to be filed by LU 2746, with the Secretary of Labor pursuant to Title 29, United States Code, Section 431, that is, the U.S. Department of Labor, Employment Standards Administration annual financial disclosure report (LM-3):

<u>Count</u>	<u>Date</u>	<u>Report Containing False Statement</u>
6	3/28/2005	LM-3
7	3/31/2006	LM-3
8	3/21/2007	LM-3

All in violation of 29 U.S.C. § 439(b).

### **FORFEITURE ALLEGATION**

Upon conviction of one or more of the offenses alleged in Counts 1-5 of this Indictment, defendant **MICHELE LYNN PEDERSEN** shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property constituting or derived from proceeds obtained directly or indirectly as a result of the said violations.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

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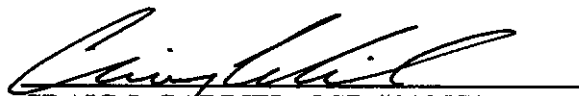
it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

DATED this 17 day of March, 2010.

A TRUE BILL

  
OFFICIATING FOREPERSON

Presented by:  
DWIGHT C. HOLTON  
United States Attorney

  
CRAIG J. GABRIEL, OSB #012571  
Assistant United States Attorney